

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

---

Earl Gavin, )  
v. Plaintiff, )  
Experian Information Solutions, Inc.; Trans Union LLC; Equifax Inc., ) Case No. 7:18-cv-00523-AMQ-JDA  
Defendants. )  
)

---

**ALTERNATIVE DISPUTE RESOLUTION (“ADR”)**  
**STATEMENT AND CERTIFICATION**

Pursuant to Local Civil Rule 16.03 and the Conference and Scheduling Order dated March 26, 2018, *see* Docket Entry No. 24, Counsel for Defendant Experian Information Solutions, Inc. (“Experian”), hereby certifies that:

1. Counsel has discussed the availability of mediation with Experian; and
2. Counsel has discussed the advisability and timing of mediation with plaintiff and counsel for co-defendants. The parties do not agree to mediation.

Experian strongly believes that mediation will not be productive in this case and, as such, believes that mediation would cause the parties to incur unnecessary additional costs. Accordingly, Experian requests that the parties not be required to go to mediation. If mediation is required, Experian agrees to complete the mediation by September 17, 2018.

Dated: April 30, 2018

Respectfully submitted,

/s/ Lyndey Ritz Zwingelberg

Lyndey Ritz Zwingelberg

(Fed ID No. 11506)

ADAMS AND REESE LLP

1501 Main Street, Fifth Floor

Columbia, South Carolina 29201

Telephone: 803-254-4190

lyndey.zwing@arlaw.com

/s/ Autumn Hamit Patterson

Autumn Hamit Patterson

*Admitted Pro Hac Vice*

Texas Bar No. 24092947

JONES DAY

2727 North Harwood St., Suite 600

Dallas, TX 75201

Telephone: (214) 969-2966

ahpatterson@jonesday.com

*Counsel for Defendant*

*Experian Information Solutions, Inc.*

**CERTIFICATE OF SERVICE**

A copy of the foregoing was filed on April 30, 2018, with the Court via the CM/ECF system, causing it to be served on all counsel of record. In addition, a copy of the foregoing was sent via mail and email to pro se Plaintiff at the physical address and email address listed below.

Earl Gavin  
300 Marion Ave  
Gaffney, SC 29341  
Egav1986@gmail.com

*/s/ Lyndey Ritz Zwingelberg*  
Lyndey Ritz Zwingelberg